

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JITENDRA VEKARIA, : Case No. 1:22-cv-03197-JPC
: Plaintiff, :
: -against- :
MTHREE CORPORATE CONSULTING, LTD., :
JOHN WILEY & SONS, INC., ECI PARTNERS :
LLP, ALEX HEADLEY, BENJAMIN TOWN, :
THOMAS SEYMOUR, and RICHARD :
CHAPMAN, :
: Defendants. :
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**DEFENDANTS JOHN WILEY & SONS, INC. AND MTHREE CORPORATE
CONSULTING, LTD.'S NOTICE OF PARTIAL MOTION TO DISMISS PLAINTIFF'S
FIRST AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendants John Wiley & Sons, Inc. (“Wiley”) and Mthree Corporate Consulting, Ltd. (“Mthree”), by and through their undersigned counsel, respectfully move to dismiss Counts Three, Four, Seven, Eight, and Nine of Plaintiff Jitendra Vekaria’s First Amended Complaint, and for other and further relief as the Court deems just and proper. In support, Wiley and Mthree submit a Memorandum of Law dated February 3, 2023, which is being filed contemporaneously with this motion.

Dated: Hoboken, New Jersey
February 3, 2023

Respectfully submitted,

By: /s/ Kevin H. Kim
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*Attorney for Defendants John Wiley & Sons, Inc.,
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Seymour*

CERTIFICATE OF SERVICE

I hereby certify that on February 3, 2023, a copy of the foregoing Defendants John Wiley & Sons, Inc. and Mthree Corporate Consulting, Ltd.'s Notice of Partial Motion to Dismiss Plaintiff's First Amended Complaint, and Defendants John Wiley & Sons, Inc. and Mthree Corporate Consulting, Ltd.'s Memorandum of Law in Support of Their Partial Motion to Dismiss Plaintiff's First Amended Complaint were served upon the following counsel of record by the Court's CM/ECF system:

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